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Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION

Case No. 13-md-02420 YGR (DMR)

MDL No. 2420

This Document Relates to:

ALL INDIRECT PURCHASER ACTIONS

**INDIRECT PURCHASER PLAINTIFFS'
NOTICE OF INTENTION TO SEAL
DOCUMENTS**

Date: January 12, 2018

Time: 10:00 a.m.

Judge: Hon. Yvonne Gonzalez Rogers

Court: Courtroom 1, 4th Floor

1 **TO THE COURT, THE CLERK, ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT**, pursuant to the Court's Order Granting Stipulation
3 Regarding Administrative Motions to Seal Materials Filed in Connection with Renewed Motion
4 for Class Certification and Related *Daubert* Motions ("Sealing Order") (Oct. 3, 2017), ECF No.
5 1967, Indirect Purchaser Plaintiffs intend to submit the following documents under seal:

- 6 1. Indirect Purchaser Plaintiffs' Reply in Support of Indirect Purchaser Plaintiffs'
7 Renewed Motion for Class Certification;
- 8 2. Declaration of Edward E. Leamer, Ph.D., in Support of Reply in Support of
9 Indirect Purchaser Plaintiffs' Renewed Motion for Class Certification;
- 10 3. Indirect Purchaser Plaintiffs' Opposition to Defendants' Motion to Exclude the
11 Proposed Expert Testimony of Dr. Edward E. Leamer; and
- 12 4. Exhibits 1-2 and 4-5 to the Declaration of Abbye R. Klamann in Support of
13 Indirect Purchaser Plaintiffs' Reply in Support of Indirect Purchaser Plaintiffs'
14 Renewed Motion for Class Certification and Opposition to Defendants' Motion to
15 Exclude the Proposed Expert Testimony of Dr. Edward E. Leamer.

16 The above documents refer to or contain information designated Confidential or Highly
17 Confidential under the applicable protective order entered in this action. The permanent sealing
18 of these documents will proceed according to the protocol described in the Sealing Order.

1 Dated: November 21, 2017

Respectfully submitted,

2 LIEFF CABRASER HEIMANN & BERNSTEIN LLP

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4 By: /s/ Brendan P. Glackin

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12 Dated: November 21, 2017

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15 By: /s/ Shana E. Scarlett

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1 Dated: November 21, 2017

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ATTESTATION

I, Brendan P. Glackin, attest, pursuant to Northern District of California, Local Rule 5-1(i)(3), that concurrence in the filing of this document has been obtained from each of the signatories hereto.

By: /s/ Brendan P. Glackin
Brendan P. Glackin